

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

*Plaintiffs,*

v.

ANTHROPIC PBC,

*Defendant.*

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair Newbern

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Fed. R. Civ. P. 5.2(d), Local Rules 5.03 and 7.01, Administrative Order 167-1, and the Stipulated Protective Order (the “Protective Order”) entered in this case (ECF No. 62), Defendant Anthropic PBC respectfully asks this Court for leave to file certain documents under seal. For the reasons set forth in the accompanying Memorandum in Support, Anthropic seeks leave to file the following documents under seal:

- Anthropic’s Opposition to Plaintiffs’ Motion for Preliminary Injunction;
- Declaration of Jared Kaplan offered in support of Anthropic’s Opposition;
  - Exhibits B and C thereto;
- Declaration of Julia Lowd offered in support of Anthropic’s Opposition;
  - Exhibits H, I, J, and K thereto;
- Declaration of Dawn Hall offered in support of Anthropic’s Opposition;
- Declaration of Steven Peterson offered in support of Anthropic’s Opposition;
- Exhibit A to the Declaration of Andrew M. Gass offered in support of Anthropic’s Opposition

In accordance with Local Rule 7.01(a)(1), the undersigned counsel certify that they contacted Plaintiffs' counsel via email on January 16, 2024, and were advised that Plaintiffs join in Anthropic's request to seal certain information, as set forth in the accompanying Memorandum, and otherwise take no position on this Motion.

Dated: January 16, 2024

Respectfully submitted,  
**NEAL & HARWELL, PLC**

/s/ Aubrey B. Harwell III

---

Aubrey B. Harwell III (BPR # 17394)  
Nathan C. Sanders (BPR # 33520)  
Olivia R. Arboneaux (BPR # 40225)  
1201 Demonbreun Street, Suite 1000  
Nashville, TN 37203  
(615) 244-1713  
tharwell@nealharwell.com  
nsanders@nealharwell.com  
oarboneaux@nealharwell.com

**LATHAM & WATKINS LLP**

Joseph R. Wetzel (*pro hac vice*)  
Andrew M. Gass (*pro hac vice*)  
505 Montgomery St., Suite 2000  
San Francisco, CA 94111  
(415) 395-8806  
(415) 395-6007  
joe.wetzel@lw.com  
andrew.gass@lw.com

Sarang V. Damle (*pro hac vice*)  
555 Eleventh Street, NW, Suite 1000  
Washington, D.C. 20004  
(212) 906-1659  
sy.damle@lw.com

Allison L. Stillman (*pro hac vice*)  
1271 Avenue of the Americas  
New York, NY 10020  
(212) 906-1747  
alli.stillman@lw.com  
*Counsel for Defendant Anthropic PBC*

## CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system and served all parties of record via the CM/ECF system as indicated below:

Steven A. Riley  
Tim Harvey  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, TN 37203  
(615) 320-3700  
sriley@rjfirm.com  
tharvey@rjfirm.com

Matthew J. Oppenheim  
Nicholas C. Hailey  
Audrey Adu-Appiah  
OPPENHEIM + ZEBRAK, LLP  
4530 Wisconsin Ave., NW, 5th Floor  
Washington, DC 20016  
(202) 480-2999  
matt@oandzlaw.com  
nick@oandzlaw.com  
aadu-appiah@oandzlaw.com

Jennifer Pariser  
Andrew Guerra  
Timothy Chung  
OPPENHEIM + ZEBRAK, LLP  
461 5th Avenue, 19th Floor  
New York, NY 10017  
(212) 951-1156  
jpariser@oandzlaw.com  
andrew@oandzlaw.com  
tchung@oandzlaw.com

Richard S. Mandel  
Jonathan Z. King  
Richard Dannay  
COWAN, LIEBOWITZ & LATMAN, P.C.  
114 West 47th Street  
New York, NY 10036-1525  
(212) 790-9200  
rsm@cll.com  
jzk@cll.com  
rxd@cll.com

*Counsel for Plaintiffs*

Dated: January 16, 2024

/s/ Aubrey B. Harwell III

Aubrey B. Harwell III